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April 3, 2006

VIA EFILING AND HAND DELIVERY

The Honorable Kent A. Jordan
United States District Court
844 King Street
Wilmington, DE 19801

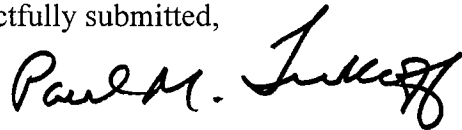
RE: Ampex Corp. v. Eastman Kodak Co., et al.
C.A. No. 04-1373 (KAJ)

Dear Judge Jordan:

I write in response to Jack Blumenfeld's letter to the Court of earlier today.

Ampex argues that it is inconsistent for defendants' expert, Richard Taylor, to rely in his expert report upon admissions of Ampex's expert, Eric Anderson, while at the same time defendants seek to disqualify Mr. Anderson as an expert. Defendants do not agree. Defendants' Motion to Disqualify Eric Anderson has not yet been granted and there is, of course, no guarantee that it will be granted. As a result, as of the time Mr. Taylor submitted his expert report, Eric Anderson remained an expert witness in this case. In fact, Mr. Anderson submitted an expert report on the same day that Mr. Taylor submitted his expert report. If, however, Defendants' Motion to Disqualify Eric Anderson is granted, Mr. Taylor will no longer seek to rely upon Mr. Anderson's admissions.

Respectfully submitted,



PAUL M. LUKOFF

PML/mhl

cc: Clerk, U.S. District Court (By Hand)
Jack B. Blumenfeld, Esq. (By Hand & Efiling)
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